

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**FELIX DELGADO, CARLOS
DOMINGUEZ, LUIS MAURISECA, KAE
HEUNG PARK, LONG FAN JIN, JORGE
PENAPIEL, MANUEL TENEZACA,
PASCACIO CALLEJAS, SANTOZ
MENDOZA, and JOAQUIN MACARENO,**

Plaintiffs,

-against-

**KIKO CONSTRUCTION INC., REX KIM,
and KWANG YONG BYUN,**

Defendants.

08CV1984 (DAB) (MDF)

ECF Case

STATEMENT OF DAMAGES

Principal amount sum certain against Defendants Kiko Construction and Rex Kim: **\$61,224.20**

1. Jorge Penapiel: \$3,493.00 of compensatory damages, \$1,898.00 of federal liquidated damages, \$873.25 of state liquidated damages, and interest at 9% from July 5, 2007 to August 11, 2008, for \$345.81, for a total as of \$6,610.06, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

2. Felix Delgado: \$1,693.00 of compensatory damages, \$974.00 of federal liquidated damages, \$423.25 of state liquidated damages, and interest at 9% from July 5, 2007 to August 11, 2008, for \$167.61, for a total as of \$3,257.86, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

3. Pascacio Callejas: \$1,693.00 of compensatory damages, \$974.00 of federal liquidated damages, \$423.25 of state liquidated damages, and interest at 9% from July 5, 2007 to August 11, 2008, for \$167.61, for a total as of \$3,257.86, as shown by the spreadsheet annexed as

Exhibit F, which is justly due and owing, and no part of which has been paid except as therein set forth.

4. Kae Heung Park: \$4,349.00 of compensatory damages, \$2,794.60 of federal liquidated damages, \$1,087.25 of state liquidated damages, and interest at 9% from May 28, 2007 to August 11, 2008, for \$473.61, for a total as of \$8,704.46, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

5. Carlos Dominguez: \$4,294.50 of compensatory damages, \$3,001.50 of federal liquidated damages, \$1,073.63 of state liquidated damages, and interest at 9% from March 7, 2007 to August 11, 2008, for \$552.70, for a total as of \$8,922.33, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

6. Manuel Tenezaca: \$2,834.50 of compensatory damages, \$1,236.00 of federal liquidated damages, \$708.63 of state liquidated damages, and interest at 9% from May 3, 2007 to August 11, 2008, for \$326.53, for a total as of \$5,105.66, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

7. Luis Mauriseca: \$6,331.29 of compensatory damages, \$1,545.00 of federal liquidated damages, \$876.50 of state liquidated damages, and interest at 9% from April 30, 2007 to August 11, 2008, for \$403.89, for a total as of \$6,331.39, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

8. Joaquin Macareno: \$3,214.50 of compensatory damages, \$1,784.50 of federal liquidated damages, \$803.63 of state liquidated damages, and interest at 9% from April 13, 2007 to August 11, 2008, for \$384.78, for a total as of \$6,187.40, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

9. Santoz Mendoza: \$3,214.50 of compensatory damages, \$1,784.50 of federal liquidated damages, \$803.63 of state liquidated damages, and interest at 9% from April 13, 2007 to August 11, 2008, for \$384.78, for a total as of \$6,187.40, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

10. Long Fan Jin: \$3,482.25 of compensatory damages, \$1,927.75 of federal liquidated damages, \$870.56 of state liquidated damages, and interest at 9% from May 28, 2007 to August 11, 2008, for \$379.22, for a total as of \$6,659.78, as shown by the spreadsheet annexed as **Exhibit F**, which is justly due and owing, and no part of which has been paid except as therein set forth.

Total (as of August 11, 2008)	\$	61,224.20
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Dated: New York, New York
August 11, 2008

HOGAN & HARTSON LLP

/s/ Dillon Kim

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Kae Heung Park, Long Fan Jin,
Jorge Penapiel, Manuel Tenezaca,
Pascacio Callejas, Santoz Mendoza,
and Joaquin Macareno*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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FELIX DELGADO, CARLOS DOMINGUEZ, :
LUIS MAURISECA, KAE HEUNG PARK, :
LONG FAN JIN, JORGE PENAPIEL, MANUEL :
TENEZACA, PASCACIO CALLEJAS, : No. 08-CV-1984 (DAB)(MDF)
SANTOZ MENDOZA, and JOAQUIN :
MACARENO, : ECF CASE
:
Plaintiffs, : **CERTIFICATE OF SERVICE**
:
-against- :
:
KIKO CONSTRUCTION INC., REX KIM, and :
KWANG YONG BYUN, :
:
Defendants. :
-----x

CERTIFICATE OF SERVICE

I, Dillon Kim, hereby certify that on August 11, 2008, I caused a true and correct copy of the Plaintiffs' Motion for Default Judgment, Declaration of Dillon Kim in Support of the Plaintiffs' Motion for Default Judgment and the exhibits annexed thereto, and the Proposed Order for Default Judgment against Kiko Construction Inc. and Rex Kim via first class mail and Federal Express upon:

Kiko Construction Inc.
41-96 Gleane Street, Apartment E-11
Elmhurst, New York 11373

and

Rex Kim
57-35 256th Street
Little Neck, New York 11362

In an abundance of caution, Kiko Construction Inc. and Rex Kim were both served copies of Plaintiffs' Default Judgment motion papers despite not having answered or responded to service of the Summons and Complaint in this action.

Dated: New York, New York
August 11, 2008

HOGAN & HARTSON LLP

/s/ Dillon Kim

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